UNITED STATES DISTRICT COURT

for the

| Middle | District | of Tennes | see |
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| | | | |

| United States v GUNNER JOS | EPH FISHER |) Case No. 24-m)) | nj-1317 | |
|--|---|-----------------------------|--|----------------|
| | CRIMINA | L COMPLAINT | | |
| I, the complainant i On or about the date(s) of | n this case, state that the follo Nov.1, 2024,to Dec.16,20 | | my knowledge and belief. Stewart | in the |
| Middle District | | the defendant(s) violated: | | _ in the |
| Code Section | , | Offense Descr | | |
| 18 U.S.C. 875(c) | Communicating | a threat in interstate comr | • | |
| _ | plaint is based on these facts: atement in support of criminal | complaint. | | |
| ♂ Continued on th | e attached sheet. | | | |
| | | | /s/ Christopher Potts | |
| | | | Complainant's signature | |
| | | F | BI SA Christopher Potts Printed name and title | |
| Attested to by the applicant telephone (specify reliable of Date: December 18, 2024) | , | rements of Fed. R. Crim. I | P. 4.1 by Judge's signature | MES DISTRICTOR |
| City and state: | NASHVILLE, TN | Barbara D. Ho | Imes, United States Magistra Printed name and title | ite Judge |

STATEMENT OF FACTS IN SUPPORT OF A CRIMINAL COMPLAINT

- 1. Your affiant, Christopher R. Potts, is a Special Agent assigned to the Nashville Field Office of the Federal Bureau of Investigation (the "FBI"). In my duties as an FBI Special Agent, I investigate domestic terrorism violations and other threats of violent crime. As an FBI Special Agent, I am authorized by law to engage in or supervise the prevention, detention, investigation, and prosecution of violations of federal law.
- 2. I make this affidavit in support of a criminal complaint charging Gunner Joseph FISHER with violations of Title 18, United States Code, Section 875(c), that is, transmitting in interstate or foreign commerce any communication containing a threat to kidnap or to injure another person.
- 3. The statements made in this affidavit are based on information from various sources including interviews of other law enforcement personnel, results of a review of FISHER's cellular telephone, interviews with FISHER, and information provided by Meta Platforms, Inc.

FACTS ESTABLISHING PROBABLE CAUSE

Background Information

4. On or about December 14, 2024, the FBI received a tip from Meta Platforms, Inc. ("META"), which indicated that the user of the Instagram account bearing username "mollyr0ckzinmygreenteaa" (hereinafter the "ACCOUNT"), with user identification (UID) number 66331031925, was posting or sending messages to another user that he or she was planning to conduct a mass shooting. META provided information showing that the ACCOUNT was created on May 5, 2024, that the telephone number associated with the account was (931) 627-9787, and that a recent internet protocol (IP) log-in of 170.103.88.116 indicated that the user accessed the internet from Big Rock, Tennessee, as recently as December 10, 2024. Additionally,

META provided information on other accounts which had been linked to the ACCOUNT. Namely, a Facebook account bearing UID 100069965241866 and username Gunner FISHER.

- 5. On December 17, 2024, the FBI served a Request for Voluntary Emergency Disclosure of Information to META for content related to the ACCOUNT. On the same day, META responded with information responsive to the request.
- 6. On or around December 17, 2024, I reviewed the contents of the ACCOUNT which had been provided by META. I observed a post made by FISHER on June 12, 2024, using the ACCOUNT, in which he stated, "Gunn er (sic) is my real name." On the same day in a subsequent post, FISHER posted, "Like my full name is Gunner Joseph fisher." FISHER also created content where he indicated that he had purchased multiple weapons, including an AR-15, extended magazines for the AR-15, a rifle scope, and a Saiga-12 shotgun. FISHER also posted pictures of firearms and other weapons which he claimed to have in his possession, including a machete and tactical vest. FISHER also posted that he was suicidal and violent.
- 7. During the review of the ACCOUNT, FISHER described how he was in the process of planning an attack and had written a manifesto related to his planned attack. On June 8, 2024, FISHER posted the following in the chat with another user:
 - "I have a new location for my operation [...] A furry convention"
 - "Wanna read my revamped manifesto"
 - "But now my life is going to end with me dead next to a bunch of fags in fur suits".

- 8. On June 12, 2024, FISHER posted in the chat, "we should hint at our manifestos our attacks respectively" and "I'm like Brenton or Ryan palmeter."
 - 9. On June 16, 2024, FISHER posted in the chat:
 - "I'm gonna go on a spree this year probaly (sic)"
 - "I think I will just snap and go to the location one day"
 - "I'm more impulsive. I'm like a bomb"
 - "I've always wanted to do this"
 - "When I was a fucking child Before I even got into school I saw crowds of people and mantises (sic) about someone mowing them down"²
 - "It's either now or later cause tmi (sic) genuinely believe (sic) im bound to murder"
- 10. On June 19, 2024, FISHER posted a photograph of himself in the chat. In the photograph, FISHER is wearing a camouflage tactical vest and holding a rifle.



¹ Ryan Palmeter was the individual responsible for committing a mass shooting at a Dollar General store in Jacksonville, Florida, in August 2023. Brenton Tarrant committed two mass shootings in Christchurch, New Zealand, on 15 March 2019, which resulted in the deaths of 51 people.

² FISHER corrected himself in a following message that indicated he "fantasized" about committing a mass shooting.

FISHER's Non-Custodial Interview

- 11. On December 14, 2024, law enforcement conducted a non-custodial interview of FISHER at his residence in Big Rock, Tennessee, where he resides with his parents. While at the residence, D.F., FISHER's father, provided the FBI with consent for the FBI to seize and search a cellular telephone (hereinafter the "DEVICE") which D.F. told law enforcement he owned and allowed FISHER to use. The cellular telephone number for the DEVICE is (931) 627-9787.
- 12. During the interview, FISHER stated that he had a fascination with previous school shootings and mass shootings. He told the FBI he had conducted research on many shootings and really enjoyed watching videos and recordings of the incidents, especially when they were live streamed by the shooter. FISHER told the FBI that his favorite mass shooter of all-time was Brenton Tarrant.
- 13. Based on FISHER's professed fascination for past attacks, the FBI believes FISHER has conducted research on previous school shooting attacks in order to possibly prepare for his own attack.
- 14. While at FISHER's residence, D.F. provided the FBI with consent for law enforcement to conduct a physical search of FISHER's room. During the search, law enforcement officers observed an American flag hanging on the wall similar to that which was observed in the photograph posted by FISHER in the Instagram chat provided by META. In addition, when FISHER learned that law enforcement intended to seize his cell phone, FISHER stated that the FBI would find his "manifesto" on his phone.

DEVICE Review

15. On or about December 16, 2024, the FBI conducted a review of the DEVICE's contents. During the review, law enforcement officers observed a video which appeared to have

been recorded or downloaded by FISHER on or around November 1, 2024. In the video, FISHER stated the following,

- "My name is Gunner Fisher"
- "Jews are the root of all evil. They want money and they want to kill the European race."
- "And sand niggers are their little minions."
- "And I, Gunner Joseph Fisher, am going to take care of them both."
- "Live. Uh, well, better prepare for your 72 virgins."
- "And ya shyamala (unintelligible) you fucking kikes."
- "Let's get this party started."



- 16. During the FBI's review of the DEVICE, law enforcement officers observed SMS text messages in a chat titled "sigma 2:3" where FISHER and the user of the other phone, who resided outside the State of Tennessee, each discussed planning and conducting future mass shooting attacks.
- 17. On December 16, 2024, law enforcement reviewed the text messages sent by FISHER in the "sigma 2:3" chat and observed text messages sent by FISHER to another telephone

number. In the text messages, starting on or around November 29, 2024, during an ongoing conversation, FISHER sent the following text messages,

- "I'm doing mine a bit early lmao"
- "2025 silly"
- "i cant wait tbh"
- "i'm too impatient to wait"
- "i've been planning for five years"
- "i am destroying hardives (sic) before then dw"
- "lanza style"³
- "i'm going after blacks"
- "are you going to mention my attack on your manifesto"
- "i'm getting stuff for my mission".
- 18. During the review of the DEVICE, law enforcement observed a document titled, "WHITEBOYSUMMER:2025," located within the Notesnook application. Based on my training and experience, the document appeared to be a manifesto which was last saved on the DEVICE on November 29, 2024. In one part of the manifesto, the document reads:

"Q: What are you going to do?"

"A:Once school starts again, Another Christchurch will happen. None of you niggers are gonna see it coming. My bombs are actually gonna work instead of those shitty duct tape fireworks Reb and Vodka called "pipe bombs", No, these will be REAL fucking bombs. No shit. My entire school is gonna be wiped off of the face on this EARTH. It's gonna be AWESOME. I'll be Wrath and Natural Selection combined. I already have my

³ Adam Lanza was the individual responsible for the Sandy Hook school shooting that took place in December 2012.

sigma hunting rifle and hundreds of rounds of live ammunition, as well as a copious amount of gunpowder which im gonna assemble into bombs. I'll plant them all over the niggerzone, and that piece of shit horrible building will become nothing but rubble. If anybody survives? Shoot them. Anybody escapes? Oh well, they were destined to get out of there. Fucking NATURAL SELECTION. You puny negros wouldn't get it anyway. Watch out, you bumbling coons at niggerland, OUTRUN. MY. FUCKING. GUN."

- 19. During the review of the DEVICE, law enforcement reviewed additional SMS text messages in the "sigma 2:3" chat between FISHER and an individual who resides outside the State of Tennessee regarding their plans to commit mass shootings. On or about December 4, 2024, FISHER texted the following:
 - "im a bit nervous tho"
 - "because shits getting real"
 - "i got my gear at my house now"
 - "it's shipped"
 - "so now i'm all in"
 - "i changed to a mosque like brenton"
- 20. FISHER then posted a screenshot from Google Maps which depicted a mosque. Based on my review of the screenshot, the mosque pictured in the screenshot is located in Nashville, Tennessee.
 - 21. Big Rock, Tennessee is located in the Middle District of Tennessee.

CONCLUSION

22. Based on the foregoing, I submit that there is probable cause to believe that between on or about November 29, 2024, through on or about December 4, 2024, Gunner FISHER transmitted in interstate or foreign commerce a communication, to wit: SMS text messages,

containing a threat to kidnap or injure the person of another, in violation of Title 18, United States Code, Section 875(c).